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By ECF

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York

Re: United States v. Zachary Clark, 20 Cr. 76 (NRB)

Dear Judge Buchwald:

In light of the current COVID-19 pandemic, I write to respectfully request that the Court adjourn the April 21 conference in this matter for approximately 90 days. The Government consents to this request.

I make this request because I have been unable to meet with Mr. Clark at the MCC since early March, and legal visiting is now suspended until at least May 18. I have accordingly been unable to complete essential case-related functions like reviewing discovery in-person with my client. If the Court grants an adjournment, I consent to an exclusion of Speedy Trial time until the adjourn date.

Thank you for your attention to this matter.

Sincerely,

/s/ Jonathan Marvinny
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cc: Gillian Grossman, Esq.
Matthew Hellman, Esq.
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